

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FINJAN SOFTWARE, LTD., an Israel corporation,)	
)	
Plaintiff-Counterdefendant,)	C. A. No. 06-369 GMS
)	
v.)	
)	
SECURE COMPUTING CORPORATION, a Delaware corporation, CYBERGUARD, CORPORATION, a Delaware corporation, WEBWASHER AG, a German corporation and DOES 1 THROUGH 100,)	
)	
Defendants-Counterclaimants.)	

**REPLY TO COUNTERCLAIMS OF DEFENDANTS SECURE
COMPUTING CORPORATION AND WEBWASHER AG**

Plaintiff and Counterclaim Defendant, Finjan Software, Ltd. ("Finjan"), responds to the counterclaims, set forth by Secure Computing Corporation and WebWasher AG, in the Answer and Counterclaims of Defendants Secure Computing Corporation, Cyberguard Corporation, and WebWasher AG ("Counterclaims") as follows:

1. Finjan admits that Defendant Secure Computing Corporation is a corporation organized and existing under the laws of the State of Delaware, with its corporate headquarters at 4810 Harwood Road, San Jose, California 95124. Except as thus expressly admitted, Finjan lacks knowledge or information sufficient to admit or deny the remaining allegations in Paragraph 23 of the Answer and on that basis denies those allegations.
2. Finjan admits the allegations of Paragraph 24 of the Counterclaims.

3. The allegations in Paragraph 25 are legal conclusions and do not require a responsive pleading. To the extent a response is required, Finjan does not dispute that the counterclaims purport to seek a declaratory judgment and that there is an actual controversy between Finjan and Secure Computing.

4. The allegations in Paragraph 26 are legal conclusions and do not require a responsive pleading. To the extent a response is required, Finjan does not dispute that jurisdiction is proper under 28 U.S.C. §1338(a) and under the Federal Declaratory Judgment Act, Title 28, sections 2201 and 2202 and that personal jurisdiction over Finjan and venue within this judicial district is proper.

5. Finjan admits the allegations of Paragraph 27 of the Counterclaims.

6. Finjan denies the allegations of Paragraph 28 of the Counterclaims.

7. Finjan denies the allegations of Paragraph 29 of the Counterclaims.

8. Finjan denies the allegations of Paragraph 30 of the Counterclaims.

PRAYER FOR RELIEF


WHEREFORE, Finjan denies that Secure Computing Corporation, Cyberguard Corporation, and WebWasher AG are entitled to any judgment or relief in their favor, including the relief in paragraph A through E of the Prayer for Relief.

POTTER ANDERSON & CORROON LLP

OF COUNSEL

Paul J. Andre
Perkins Coie LLP
101 Jefferson Drive
Menlo Park, CA 94025-1114
(650) 838-4300

Dated: August 15, 2006
746052

By: 

Philip A. Rovner (#3215)
Hercules Plaza
P. O. Box 951
Wilmington, DE 19899
(302) 984-6000
provner@potteranderson.com

Attorneys for Plaintiff
Finjan Software, Ltd.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on August 15, 2006, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY HAND DELIVERY

Frederick L. Cottrell, III, Esq.
Matthew W. King, Esq.
Richards, Layton & Finger, P.A.
One Rodney Square
920 N. King Street
Wilmington, DE 19801

/s/ Philip A. Rovner

Philip A. Rovner (#3215)
Potter Anderson & Corroon LLP
Hercules Plaza
P.O. Box 951
Wilmington, Delaware 19899
(302) 984-6000
E-mail: provner@potteranderson.com